

# COHEN & GREEN

March 22, 2023

Hon. Vera M. Scanlon, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, 1214 South  
Brooklyn, New York 11201

By Electronic Filing.

**Re: York v. City of New York, 22-cv-06432**

Dear Judge Scanlon:

I am co-counsel for Plaintiff in the case above. As we discussed might be necessary (but I had hoped not), I write to request an extension of time to serve a settlement demand from the time set in the Court's March 6, 2023 Minute Order (setting March 22, 2023 as the date for a demand).<sup>1</sup>

As discussed at the conference, Ms. York is seeing a specialist who will be preparing an expert report, which we believe is necessary to making any demand, as well as (we think) helpful for Defendants in evaluating any demand. That process is taking slightly longer than expected, since we only just received records our expert needs to review from six other providers. Ms. York also has had a referral for an x-ray that she has only been able to schedule for this coming week. We would therefore ask — in an abundance of caution — for an additional 60 days. That would make the deadline to serve the demand Monday, May 5, 2023.

Defendants consent to this extension request. All the other deadlines set in the March 6, 2023 Minute Order would not be changed by this request. However, the parties intend to separately write to discuss adjusting other deadlines to focus on settlement.

As ever, I thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

*Honorific/Pronouns: Mx., they/their/them*

**COHEN&GREEN P.L.L.C.**

*Attorneys for Plaintiff*

1639 Centre St., Suite 216

<sup>1</sup> I apologize this letter is being filed at close of business the day of the deadline. I had discussed with Defendants and they consented before today, but I failed to file the letter until now.



Ridgewood, New York 11385

cc:

All relevant parties by ECF.